

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

December 06, 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

BY: Natasha Martinez

DEPUTY

Case No. SA-23-MJ-1681

HECTOR DELGADO-ESCAMILLA (1)

ANTONIO CORTEZ-CHAVES (2)

JORGE SALVATORI ESCOBAR-BARRAGAN (3)

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2023 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 932

Straw purchasing of firearms

Penalties: Up to 25 years imprisonment, 3 years supervised release,
\$250,000 fine, Forfeiture

This criminal complaint is based on these facts:

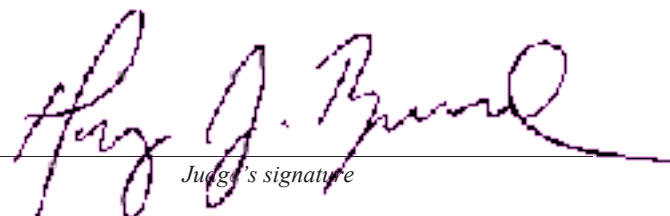
SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Jason L Glance

Digitally signed by Jason L Glance
Date: 2023.12.06 10:43:09 -06'00'*Complainant's signature*

JASON GLANCE, ATF SPECIAL AGENT

Printed name and title☐ Sworn to before me and signed in my presence.☒ Sworn to telephonically and signed electronically.Date: 12/06/2023City and state: San Antonio, Texas*Judge's signature*

HENRY J. BEMPORAD, US MAGISTRATE JUDGE

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Jason Glance, being duly sworn do hereby depose and state:

1. Your affiant is currently employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has been so employed since June 2020. Additionally, your affiant was a United States Border Patrol Agent since December 2006, and therefore, your affiant has participated in investigations concerning violations of Titles 8 and 18.
2. On Tuesday December 5, 2023, Hector DELGADO-Escamilla (hereafter DELGADO) purchased in cash, a (used) FN Browning model M249S, 5.56 caliber rifle, bearing serial number M249SA08065 for ten thousand dollars. The purchase was made at Adelbridge & CO. Firearms (hereafter Adelbridge), located at 7080 San Pedro Ave. San Antonio, TX 78216. DELGADO originally paid \$5,000 in cash to place the M249S on layaway and left the store.
3. At approximately 1:00pm on December 5, 2023, DELGADO returned to Adelbridge and paid the rest of the money in cash. DELGADO completed the ATF Form 4473 indicating he was purchasing the firearm for himself. After the purchase of the firearm, Special Agents from ATF and OEE made contact with DELGADO and a male subject that accompanied him, identified as Antonio CORTEZ-Chaves (hereinafter CORTEZ) in the parking lot at Adelbridge in San Antonio, Texas. The subjects, DELGADO and CORTEZ, agreed to speak with federal agents. After a few minutes DELGADO admitted to straw purchasing the firearm.
4. During the post-*Miranda* interview with DELGADO about the firearm purchase. DELGADO admitted the firearm was intended for another person. DELGADO was to deliver to the firearm to an apartment and provide it the firearm to Jorge Salvatori ESCOBAR-Barragan (hereafter ESCOBAR).
5. Agents established surveillance at the apartment. ESCOBAR was contacted and came out of the apartment to the vehicle to pick up the firearm. ESCOBAR was advised of the identity of the federal agents, agreed to speak with the agents, and granted consent to search the apartment.
6. During post *Miranda* interviews, DELGADO, CORTEZ, and ESCOBAR separately confessed to the conspiracy to straw purchase the firearm. All three confessed separately to knowing that the M249S was intended for illegal export/trafficking to Mexico. CORTEZ and ESCOBAR have known each other for years and met initially in Michoacán, Mexico.

7. CORTEZ facilitated the introduction of DELGADO to ESCOBAR for assistance in obtaining the firearm. The three conspired for DELGADO to purchase the firearm with cash provided by ESCOBAR and then deliver that firearm to ESCOBAR's apartment in San Antonio. ESCOBAR provided the \$5,000 cash to DELGADO and when that was not sufficient for the purchase of the firearm, DELGADO returned to ESCOBAR's apartment and obtained the additional cash from ESCOBAR.
8. DELGADO and CORTEZ acknowledged that upon delivery of the firearm they would be compensated monetarily.
9. Based on the above facts, your affiant believes there is probable cause that Hector DELGADO-Escamilla, Jorge Salvatori ESCOBAR-Barragan and Antonio CORTEZ-Chaves conspired to purchase a firearm in and affecting interstate and foreign commerce for, on behalf of and at the request and demand of any other person, knowing and having reasonable cause to believe such other person intends to use, carry, possess, and sell and otherwise dispose of the firearm in furtherance of a felony, in violation of Title 18 U.S.C. § 932.

Jason L Glance Digitally signed by Jason L Glance
Date: 2023.12.06 10:43:24 -06'00'

Special Agent Jason Glance
Bureau of Alcohol, Tobacco, Firearms and
Explosives

SUBSCRIBED AND SWORN TO ME THIS 6th DAY OF December, 2023.


HONORABLE HENRY BEMPORAD
UNITED STATES MAGISTRATE JUDGE